

Exhibit F

Robert Michael Carr, Jr.

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO, EAST COUNTY REGIONAL CENTER

MARY GIORDANO, individually)
and on behalf of the Estate of)
Jacqueline Keith and other)
qualified survivors,)

Plaintiffs,)

Case No.

00069363-CU-PO-EC

vs.)
)

C.R. BARD, INC., a)
corporation, BARD PERIPHERAL)
VASCULAR, INC., a corporation,)
THOMAS BRANNIGAN, M.D, an)
individual, FRANKLIN KALMAR,)
M.D., an individual, SHARP)
GROSSMONT HOSPITAL, a)
corporation, SHARP HEALTHCARE,)
a corporation, and DOES 1)
through 100 inclusive,)

Defendants.)

VIDEOTAPED DEPOSITION OF ROBERT MICHAEL CARR, JR.

Phoenix, Arizona
November 5, 2013

BY: KIM BATA, RMR/CSR
Certified Reporter 50233

Robert Michael Carr, Jr.

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1 A. Again, the goal of the design is to
2 minimize each of those.

3 Q. But was it your expectation that an
4 IVC filter -- a Recovery filter, a G2 or G2
5 Express -- must avoid complications of the type
6 mentioned in that document?

7 A. No.

8 MR. NORTH: Objection to the form.

9 THE WITNESS: No.

10 BY MR. JOHNSON:

11 Q. Sir, would you agree that optional
12 filters -- the Recovery, the G2, the G2
13 Express -- should perform as well as permanent
14 filters?

15 A. Yes.

16 MR. NORTH: Objection to the form.

17 BY MR. JOHNSON:

18 Q. And during this time frame -- that is
19 the Recovery era, the G2 era and the G2 Express
20 era -- did Bard have a truly permanent filter
21 that was commercially available?

22 MR. NORTH: Objection to the form.

23 THE WITNESS: All of them are truly
24 permanent.